

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BYTEMARK, INC.,

Plaintiff,

v.

XEROX CORP., ACS TRANSPORT
SOLUTIONS, INC., XEROX
TRANSPORT SOLUTIONS, INC.,
CONDUENT INC., and
NEW JERSEY TRANSIT CORP.,

Defendants.

Civil Action No. 1:17-cv-01803-PGG-JW

JURY TRIAL DEMANDED

DECLARATION OF DARIUSH KEYHANI

I, Dariush Keyhani, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over twenty-one years of age and have personal knowledge of the following facts or access to information and/or records allowing me to confirm these facts.
2. I am a member with the law firm of Keyhani LLC and represent Third Party Jennifer Meredith (“Meredith”).
3. I submit this declaration in support of Meredith’s Motion to Quash Defendants’ Subpoena and for a Protective Order.
4. Attached hereto as Exhibit A is a true and correct copy of Defendants’ Notice of Amended Subpoena and Defendant’s Subpoena served upon Meredith.
5. Attached hereto as Exhibit B is a true and correct copy of Defendants’ Third Set of Requests for Production served upon Plaintiff Bytemark, Inc.

Executed on: July 5, 2022

/s/ Dariush Keyhani